

From: [Helton, Katie](#)
To: [REDACTED]
Cc: [Parnell, Dan](#)
Subject: Annual Inspection Follow Up - Industrial Wastewater Discharge Permit 433.051
Date: Wednesday, December 06, 2017 8:25:00 AM
Attachments: [SKM_C364e17120608320.pdf](#)
[SKM_C364e17120608300.pdf](#)
[SKM_C364e17120608310.pdf](#)

[REDACTED],

On December 5, 2017, the City performed an annual inspection of SoloPower at 6308 N marine Drive regarding Industrial Wastewater Discharge Permit 433.051 (see attached inspection form). During the inspection, the City confirmed that SoloPower is not currently operating. SoloPower informed the City that funds have been verbally approved for SoloPower to start production in January.

During the inspection, the following actions items were identified:

1. Based on the SMR provided to the City on October 4, 2016, it would appear as though SoloPower has opted out of testing for TTO and instead certifies that no concentrated TTOs are discharged. Review the draft TTO plan provided to the City in August of 2016, which states that two TTO samples will be taken per year (see attached TTO plan). To continue certifying and not sampling, please update and finalize the Draft TTO plan provide to the City. Due **December 15, 2017**.
2. The cooling tower Submeter that has been inactive for approximately 3 years will be removed from the City database unless the location of the meter, serial number, and a statement regarding the desire to keep the Submeter is provided to the City by SoloPower. Due **December 15, 2017**.

As a reminder, you must inform the City of when operations are going to start up; and SoloPower must notify the City any wastewater discharge **30 days prior** to the discharge of any wastewater commencing. Please let me know if you have any questions.

Thank you,

Katie Helton, EIT
Bureau of Environmental Services
6543 N Burlington Ave
Portland, OR 97203
[REDACTED]

From: Helton, Katie
Sent: Wednesday, November 29, 2017 11:09 AM
To: [REDACTED]
Cc: Parnell, Dan <Dan.Parnell@portlandoregon.gov>
Subject: RE: Industrial Wastewater Discharge Permit 433.051

Thanks [REDACTED],

Katie Helton, EIT
Bureau of Environmental Services
6543 N Burlington Ave
Portland, OR 97203
[REDACTED]

From: [REDACTED]
Sent: Wednesday, November 29, 2017 11:08 AM
To: Helton, Katie <Katie.Helton@portlandoregon.gov>
Subject: RE: Industrial Wastewater Discharge Permit 433.051

I will meet you there.

[REDACTED]

From: Helton, Katie [<mailto:Katie.Helton@portlandoregon.gov>]
Sent: Wednesday, November 29, 2017 11:07 AM
To: [REDACTED]
Subject: RE: Industrial Wastewater Discharge Permit 433.051

[REDACTED]

The City must perform an annual inspection, even if it only confirms that the facility is not in production. Can you meet me at the facility on Tuesday, December 5, 2017 at 9:30 am? If not, who will be my contact for the site visit? Below are some examples of the types of records I will ask to see while on site:

1. At least 3 years of copies of the submitted Self-Monitoring Report Forms
2. Copy of Permit 400.125
3. Waste manifests or BOL/receipts
4. Accidental Spill Prevention Plan
5. pH meter calibration records

Thank you,

Katie Helton, EIT
Bureau of Environmental Services
6543 N Burlington Ave
Portland, OR 97203
[REDACTED]

From: [REDACTED]
Sent: Wednesday, November 22, 2017 4:15 PM
To: Helton, Katie <Katie.Helton@portlandoregon.gov>
Cc: Parnell, Dan <Dan.Parnell@portlandoregon.gov>
Subject: RE: Industrial Wastewater Discharge Permit 433.051

Katie,

Based upon the phone conference I had this morning, even if we do get a signed agreement by the end of this month, it will takes several weeks to actually get the funds. So I don't think we could start up before the first of the new year.

Best regards,

[REDACTED]

From: Helton, Katie [<mailto:Katie.Helton@portlandoregon.gov>]
Sent: Wednesday, November 22, 2017 4:04 PM
To: [REDACTED]
Cc: Parnell, Dan <Dan.Parnell@portlandoregon.gov>
Subject: RE: Industrial Wastewater Discharge Permit 433.051

[REDACTED],

Do you foresee starting up operations for anytime during the remainder of the year?

Thank you,

Katie Helton, EIT
Bureau of Environmental Services
6543 N Burlington Ave
Portland, OR 97203
[REDACTED]

From: Parnell, Dan
Sent: Thursday, October 19, 2017 3:21 PM
To: Helton, Katie <Katie.Helton@portlandoregon.gov>; [REDACTED]
Subject: RE: Industrial Wastewater Discharge Permit 433.051

[REDACTED],

Looking at the correspondence between you and Biola and now Katie there is a history of uncertainty in regards to SoloPower's operations. However, since SoloPower has chosen to maintain a discharge permit amidst this uncertainty, it is still bound by the permit conditions, including as Katie has stated below submittal of monthly compliance reports.

As the permit issuer, the City of Portland is still required by the State to sample effluent discharges, inspect the facility annually, and conduct enforcement actions as warranted. Please be advised that SoloPower is required to provide a minimum 30 day notification prior to commencing discharge of regulated wastewaters, so the City can schedule effluent sampling. Also, we will be scheduling an inspection prior to December 31st. Please remember that SoloPower is required to pay its annual Industrial Wastewater Discharge permit fee of \$5116.

Should you have any questions concerning the status of the SoloPower permit, please do not hesitate to contact me.

Regards,

Dan Parnell
Industrial Permitting Manager
City of Portland - Bureau of Environmental Services
Water Pollution Control Laboratory
6543 N. Burlington Ave.
Portland, OR 97203-5452

[REDACTED]

From: Helton, Katie
Sent: Thursday, October 19, 2017 9:54 AM
To: [REDACTED]
Cc: Parnell, Dan <Dan.Parnell@portlandoregon.gov>
Subject: Industrial Wastewater Discharge Permit 433.051

[REDACTED],

Thanks for the letter and prompt responses to our inquiries. The Batch Discharge Report that SoloPower is responsible for submitting each month is attached to this e-mail. Please fill out, initial, and sign the Batch Discharge Report for each month of 2017, January through September. If there was no discharge in a given month, the initials and signatures on the Batch Discharge Report will be used to certify no discharge occurred.

Moving forward, the attached Batch Discharge Report should be filled out and submitted, regardless of month with no discharge, according to the reporting schedule of Permit 433.051:

Parameter	Sample Type	First Quarter			Second Quarter			Third Quarter			Fourth Quarter		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Metals													
Arsenic (total)													
Cadmium (total)	Grab	✓			✓			✓			✓		
Chromium (total)	Grab	✓			✓			✓			✓		
Copper (total)	Grab	✓			✓			✓			✓		
Lead (total)	Grab	✓						✓					
Mercury (total)													
Molybdenum													
Nickel (total)	Grab	✓			✓			✓			✓		
Selenium (total)	Grab	✓			✓			✓			✓		
Silver (total)	Grab	✓			✓			✓			✓		
Zinc (total)	Grab	✓			✓			✓			✓		
Non-Metals													
Cyanide (total)	Grab	✓						✓					
pH	Continuous	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Oil and Grease (total)	Grab												
Total Toxic Organics (TTO)	Grab	✓						✓					
Discharge Volume Flow Report		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Due Dates				Apr 15			Jul 15			Oct 15			Jan 15

Late reports *may* be subject to enforcement, which can escalate after a report is greater than 30 days late. Please submit September's Batch Discharge Report **by November 14, 2017** to avoid September's report being greater than 30 days past due.

Submit all other 2017 Batch Discharge Reports by **November 14, 2017**.

If there are changes to SoloPowers plans to commence discharge in the next month please let the City know so that we may discuss closing Permit 433.051.

Thank you,

Katie Helton, EIT
Bureau of Environmental Services
6543 N Burlington Ave
Portland, OR 97203
[REDACTED]

From: [REDACTED]
Sent: Wednesday, October 18, 2017 12:15 PM
To: Helton, Katie <Katie.Helton@portlandoregon.gov>
Subject: Solopower status

Katie,

Here is a letter I drafted. I will put it in the mail today if it is acceptable.

Best regards,



M
T
www.solopower.com

The contents of this message, together with any attachments, are intended only for the use of the individual or entity to which they are addressed and may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please notify the original sender at SoloPower Systems Tel: 503-388-3710 immediately by telephone or by return E-mail and delete this message, along with any attachments, from your computer. Thank you.